

EXHIBIT K

From: Roeser, Stephanie <S.Roeser@manatt.com>
Sent: Wednesday, May 7, 2025 6:25 PM
To: Bender, Kristin; Kevin A. Fritz
Cc: Bruno, Matthew; Stacey Ashby; Mitch Schuster; Amit Shertzer; Summer Benson; Birtha Vaneta; Miles Cooley; Cortni Davis; Bryan Freedman; Jose Perez; Jason Sunshine; Theresa Troupson; cbabcock@jw.com; jglover@jw.com; Sigrid McCawley; Lindsey Ruff; Andrew Villacastin; katebolger@dwt.com; samcategumpert@dwt.com; nicholasinns@quinnemanuel.com; maarenchoksi@quinnemanuel.com; kristintahler@quinnemanuel.com; anthony@umklaw.com; matthew@umklaw.com; Connolly, Michaela; Gottlieb, Michael; Governski, Meryl Conant; Nathan, Aaron E.; Climaco, Katelyn; Hudson, Esra; Mitra Ahouraian Esq; Taustine, Melissa
Subject: RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

Kevin,

We still have not received any of the information requested below. The only response you provided during the parties' April 5 conferral was that Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, Suleman, and Benson (the "Wayfarer Third Parties") were in the process of collecting responsive material from sources with relevant information. As you know, you requested, and we agreed to, extended dates of compliance for document production as follows: April 16 for Hanks, Toskovic, and Musiol; April 21 for Blackmon; and April 23 for Dang, Reese, Marbory, Suleman, and Benson. Those dates have passed, and we have not received a single document.

By the end of this week, please confirm whether Wayfarer, as a party, is collecting the professional materials of the Wayfarer Third Parties for purposes of their compliance with the Rule 45 subpoenas. If we do not hear otherwise, it is our understanding that the individual Wayfarer Third Parties are collecting and will produce all material in their possession, custody and control, including their personal and professional documents and communications.

We will follow-up to memorialize the meet and confer discussions as to the Wayfarer Parties separately.

Best,
Stephanie

Stephanie Roeser
Partner

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From: Bender, Kristin <KBender@willkie.com>
Sent: Monday, April 28, 2025 12:37 PM

To: Kevin A. Fritz <kaf@msf-law.com>
Cc: Roeser, Stephanie <SROeser@manatt.com>; Bruno, Matthew <MBruno@manatt.com>; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; cbabcock@jw.com; jglover@jw.com; Sigrid McCawley <smccawley@bsflp.com>; Lindsey Ruff <LRuff@bsflp.com>; Andrew Villacastin <AVillacastin@bsflp.com>; katebolger@dwt.com; samategumpert@dwt.com; nicholasinns@quinnemanuel.com; maarenchoksi@quinnemanuel.com; kristintahler@quinnemanuel.com; anthony@umklaw.com; matthew@umklaw.com; Connolly, Michaela <MConnolly@willkie.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Climaco, Katelyn <KClimaco@manatt.com>; Hudson, Esra <EHudson@manatt.com>; Mitra Ahouraian Esq <mitra@ahouraianlaw.com>; Taustine, Melissa <MTaustine@willkie.com>
Subject: RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

Kevin,

You have not answered my questions regarding the collection status and expected dates of production for the nine third parties, referenced below, that you represent.

For each of Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, Suleman, and Benson, please identify:

- Whether the collections are completed, underway, or have yet to begin
- Which sources have been, are being, or will be collected, including personal devices, personal email, work email, etc.
- Dates by which each will be making his or her initial production in connection with the subpoenas received

Please be advised that if we do not receive answers to these basic questions, we will be forced to seek relief from the Court.

Thanks,
Kristin

Kristin Bender
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From: Kevin A. Fritz <kaf@msf-law.com>
Sent: Friday, April 25, 2025 6:24 PM
To: Bender, Kristin <KBender@willkie.com>
Cc: Stephanie Roeser <SROeser@manatt.com>; Matthew Bruno <MBruno@manatt.com>; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>

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Subject: Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

***** EXTERNAL EMAIL *****

Kristin:

It has been seven months since your firm commenced an action in New York State court and issued a subpoena therein in a manner that, from our view, appears to be intentionally designed to circumvent the rules of discovery and to prevent our clients from having any notice thereof and an opportunity to object thereto. Please advise why your firm refuses to provide us with a copy of the subpoena.

As for the responses to the subpoenas that you seek, rest assured that our team is diligently working to collect, review and produce any relevant, non-privileged documents in the recipients' possession, custody or control.

Meister Seelig & Fein PLLC

Kevin A. Fritz

Partner

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On Apr 25, 2025, at 11:50 AM, Bender, Kristin <KBender@willkie.com> wrote:

CAUTION: This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Counsel,

It has been a month since third parties Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, Suleman, and Benson agreed to produce the non-privileged materials and documents responsive to each of the requests posed in the respective subpoenas issued to them. While we understand that responsive information and documents from Wayfarer-issued email accounts will be issued in the course of party discovery, there is no reason for delay in the production of relevant information and documents from these individuals' personal devices, personal email, and other applicable repositories.

Please advise as to the state of collections with respect to each of these individuals, and provide the date or dates by which these individuals intend to make their initial productions.

Best,
Kristin

Kristin Bender
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From: Bender, Kristin <KBender@willkie.com>
Sent: Wednesday, April 2, 2025 5:34 PM
To: Kevin A. Fritz <kaf@msf-law.com>
Cc: Stephanie Roeser <SROeser@manatt.com>; Matthew Bruno <MBruno@manatt.com>; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; cbabcock@jw.com; jglover@jw.com; Sigrid McCawley <smccawley@bsflpp.com>; Lindsey Ruff <LRuff@bsflpp.com>; Andrew Villacastin <AVillacastin@bsflpp.com>; katebolger@dwt.com; samcategumpert@dwt.com; nicholasinns@quinnemanuel.com; maarenchoksi@quinnemanuel.com; kristintahler@quinnemanuel.com; anthony@umklaw.com; matthew@umklaw.com; Connolly, Michaela <MConnolly@willkie.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Katelyn Climaco <KClimaco@manatt.com>; Esra Hudson <EHUDSON@manatt.com>
Subject: RE: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

Kevin,

Your mischaracterization of my email is neither warranted nor productive. Surely you understand why we wished to confirm the position that these third parties are taking with respect to what they will produce in response to the subpoenas issued to them. Among other benefits, doing so generally tends to avoid unwarranted claims of fabrication.

It is not clear to us what, substantively, your response is intended to convey. It seems as though you are in agreement except to clarify that any production will be subject to assertions of privilege. If that is incorrect, we ask that you or your colleagues let us know and identify some times to further meet and confer. We are willing to work to accommodate your schedule.

-Kristin

Kristin Bender

Willkie Farr & Gallagher LLP

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From: Kevin A. Fritz <kaf@msf-law.com>

Sent: Wednesday, April 2, 2025 4:46 PM

To: Bender, Kristin <KBender@willkie.com>

Cc: Stephanie Roeser <SROeser@manatt.com>; Matthew Bruno <MBruno@manatt.com>; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; cbabcock@jw.com; iglover@jw.com; Sigrid McCawley <smccawley@bsflp.com>; Lindsey Ruff <LRuff@bsflp.com>; Andrew Villacastin <AVillacastin@bsflp.com>; katebolger@dwt.com; samcategumpert@dwt.com; nicholasinns@quinnemanuel.com; maarenchoksi@quinnemanuel.com; kristintahler@quinnemanuel.com; anthony@umklaw.com; matthew@umklaw.com; Connolly, Michaela <MConnolly@willkie.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Katelyn Climaco <KClimaco@manatt.com>; Esra Hudson <EHUDSON@manatt.com>

Subject: Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

*** EXTERNAL EMAIL ***

Kristin:

I'm out of the office the rest of this week with my family. As you surely recall from our phone call, our clients agreed to produce all non-privileged documents that are within their possession, custody or control, and within the scope of FRCP 26(b)(1). Your effort to somehow crystalize our position, with some unilateral deadline to respond to your misrepresentation thereof, is improper. To avoid any further attempts by you to fabricate an "understanding", please note that we do not agree with any of your statements unless we expressly so state in writing.

Meister Seelig & Fein PLLC

Kevin A. Fritz

Partner

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On Apr 2, 2025, at 3:17 PM, Bender, Kristin <KBender@willkie.com> wrote:

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All, please find attached a small third-party production from The Skyline Agency.

Kevin, please let us know this week if you have any issue with our written summary of your position taken on March 25 with respect to the third-party subpoenas, as addressed below on April 1. Otherwise, we will understand that you agree and confirm it is accurate.

Best,
KB

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From: Kevin A. Fritz <kaf@msf-law.com>
Sent: Tuesday, April 1, 2025 8:54 PM
To: Stephanie Roeser <S.Roeser@manatt.com>
Cc: Matthew Bruno <M.Bruno@manatt.com>; Stacey Ashby <sma@msf-law.com>; Mitch Schuster <ms@msf-law.com>; Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Birtha Vaneta <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <c.davis@lftcllp.com>; Bryan Freedman <b.freedman@lftcllp.com>; Jose Perez <j.perez@lftcllp.com>; Jason Sunshine <j.sunshine@lftcllp.com>; Theresa Troupson <t.roupson@lftcllp.com>;

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Lindsey Ruff <LRuff@bsflp.com>; Andrew Villacastin <AVillacastin@bsflp.com>;
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<MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Katelyn
Climaco <KClimaco@manatt.com>; Esra Hudson <EHudson@manatt.com>

Subject: Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

*** EXTERNAL EMAIL ***

Stephanie:

We are still reviewing the ESI stipulation and should be able to meet and confer later next week.

Meister Seelig & Fein PLLC

Kevin A. Fritz

Partner

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On Apr 1, 2025, at 6:10 PM, Roeser, Stephanie
<SROeser@manatt.com> wrote:

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Kevin,

Please provide some windows for when counsel for the Wayfarer Parties are available to meet and confer regarding the ESI stipulation circulated last week (attached again here). We think it is important for the parties to reach an agreement as soon as possible and prior to forthcoming productions.

Additionally, following up on the below related to our March 25 meet and confer regarding the subpoenas issued to Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, Suleman, and Benson. Will you please confirm the following:

1. Each of these witnesses will agree to produce documents relevant to the parties' claims and defenses that are responsive to each of the requests in the subpoenas respectively issued to them.
2. To the extent these individuals have Wayfarer-issued email accounts, discoverable information in those accounts will be produced by Wayfarer in the course of party discovery.

Thank you,
Stephanie

Stephanie Roeser

Partner

<>

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From: Bruno, Matthew <MBruno@manatt.com>
Sent: Wednesday, March 26, 2025 7:12 PM
To: sma@msf-law.com; kaf@msf-law.com; Mitch Schuster <ms@msf-

[law.com](#); Amit Shertzer <as@msf-law.com>; Summer Benson <sbenson@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Bryan Freedman <bfreedman@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Theresa Troupson <ttroupson@lftcllp.com>; cbabcock@jw.com; jglover@jw.com; Sigrid McCawley <smccawley@bsflp.com>; Lindsey Ruff <LRuff@BSFLLP.com>; Andrew Villacastin <AVillacastin@BSFLLP.com>; katebolger@dwt.com; samcategumpert@dwt.com; nicholasinns@quinnemanuel.com; maarenchoksi@quinnemanuel.com; kristintahler@quinnemanuel.com; anthony@umklaw.com; matthew@umklaw.com
Cc: Bender, Kristin <KBender@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Climaco, Katelyn <KClimaco@manatt.com>; Hudson, Esra <EHUDSON@manatt.com>; Roeser, Stephanie <SROeser@manatt.com>
Subject: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL

Counsel:

Attached, please find Ms. Lively's Third Set of Requests for Productions to the Wayfarer Defendants. These requests are designated "confidential" pursuant to the governing protective order. (ECF No. 125).

Separately, we write to memorialize yesterday's meet and confer. Based on our call, we understand that third parties Hanks, Toskovic, Musiol, Dang, Reese, Blackmon, Marbory, Suleman, and Benson each agree to produce the documents relevant to the parties' claims and defenses that are responsive to each of the requests in the subpoenas respectively issued to them. We further understand that, to the extent these individuals have Wayfarer-issued email accounts, discoverable information in those accounts will be produced by Wayfarer in the course of party discovery. Please let us know if you disagree.

Many thanks,

Matt

Matthew Bruno

Partner

<image001.png>

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<2025.03.27 DRAFT ESI Stipulation.docx>

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